

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MILLAGROS IMPORTS LIMITED, a
New York corporation,

Plaintiff,

v.

PROGRESS VANTAGE LIMITED,
A foreign corporation,

Defendant.

07-CV-3215 (SHS)

ECF CASE

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Declaration of Vanessa Soriano Power, dated March 5, 2008, with accompanying exhibits, and Memorandum of Law, Plaintiff Milagros Imports Limited ("Plaintiff"), shall move this Court, before the Honorable Sidney H. Stein, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, for: (i) leave, pursuant to Rule 15 of the Federal Rules of Civil Procedure, to amend its answer to Defendant/Counterclaimant Progress Vantage Limited's Counterclaim to include the Statute of Frauds as an additional affirmative defense; and (ii) such other and further relief as this Court deems just and proper.

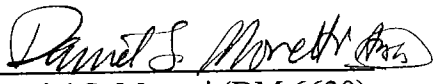
PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), any opposing affidavits and answering memoranda shall be served within ten business days after service of the moving papers, and any reply affidavits and memoranda of law shall be served within five business days after service of the answering papers.

Dated: March 5, 2008

New York, New York

Respectfully submitted,

LANDMAN CORSI BALLAINE & FORD P.C.

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